



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10**

1200 Sixth Avenue, Suite 900  
Seattle, WA 98101-3140

OFFICE OF  
WATER AND  
WATERSHEDS

Mr. David White, Office of the Chief  
United States Department of Agriculture  
Natural Resources Conservation Service  
Conservation Innovations Grant Program  
Post Office Box 2890  
Washington, D.C. 20013-2890

RE: Support for CIG proposal: *Multi-State Regulatory Agency Guidance for Water Quality Trading: State agencies building shared trading policies & tools for the Pacific Northwest and beyond.*

Dear Mr. White:

We understand that the Willamette Partnership along with the Oregon Department of Environmental Quality (ODEQ), the Idaho Department of Environmental Quality (IDEQ), the Washington Department of Ecology (Ecology) and the Freshwater Trust (TFT) are pursuing a Conservation Innovations Grant from the Natural Resources Conservation Service (NRCS) to develop a standardized structure across the region that creates incentives for water quality trading to achieve environmental objectives in a scientifically robust, and financially efficient manner.

USEPA Region 10 is very interested in and supportive of the objective to develop a trusted and scalable tool for water quality trading and a standardized system that ensures credibility, transparency and proven performance to achieve water quality standards over time. While we have had some success in utilizing water quality trading to achieve water quality improvements in the Region and nationwide, we believe that water quality trading could be more fully utilized to help us achieve our mutual water quality goals more efficiently and cost-effectively. Our experiences show that some of the barriers to water quality trading are based in real concerns about regulatory uncertainty, inconsistency, and ambiguity about how trading programs for water quality credits and "pre-TMDL" offsets work, with different approaches taken by each state. We believe this project could result in the creation of a regionally consistent and robust guidance for water quality trading, with verifiable credit protocols, and a roadmap for both point sources and non-point sources to utilize. Such a tool could help parties identify important trading opportunities that will lead to water quality improvements. Therefore, to show our support for this effort, we plan to provide a senior staff representative to participate in the project.

I understand that the goal of this project is to develop a regional guidance and standard operating procedures that our states could adopt and follow.

USEPA Region 10 is very interested in being a key participant in the states' efforts to ensure that what is developed is consistent with the Clean Water Act and its implementing regulations, and enhances achievement of water quality goals through verifiable innovative watershed-based approaches. I can be reached at (206) 553-4198 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Michael A. Bussell', written over the printed name.

Michael A. Bussell, Director,  
Office of Water and Watersheds

cc: Mr. Kelly Susewind, Program Manager  
Water Resources, Washington State Department of Ecology

Mr. Barry Burnell, Administrator  
Water Quality Division, Oregon Department of Ecology

Mr. Greg Aldrich, Administrator  
Water Quality Division, Oregon Department Of Environmental Quality

Mr. David Primozych, Director  
Ecosystem Services, The Freshwater Trust